

AYSE KENT (SBN 251114)
ayse@aklaw.co
HILLARY W. MAJOR (SBN 321294)
hillary@aklaw.co
AK EMPLOYMENT LAW OFFICE
100 Pine Street, Suite 1250
San Francisco, CA 94111
Tel: (415) 638-9471

Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

MARK FEW,

Plaintiff,

VS.

LENOVO (UNITED STATES), INC., a Delaware

Corporation, and Does 1 through 10,
inclusive,

Defendants.

Case No. 4:20-cv-03115-KAW

**STIPULATED ADMINISTRATIVE
MOTION FOR LEAVE TO EXCEED
PAGE LIMIT FOR JOINT LETTER
AND ATTACHMENTS; AND
ORDER**

1 Pursuant to Northern District of California Civil Local Rules 7-11 and 7-12, Plaintiff Mark Few
2 (“Plaintiff”) and Defendant Lenovo (United States), Inc. (“Defendant”), by and through their respective
3 attorneys, hereby stipulate as follows:

4

5 **STIPULATION**

6

7 WHEREAS, the Parties wish to file a Joint Letter regarding their discovery dispute about
8 Defendant’s responses to Plaintiff’s Request for Production of Documents (“Joint Letter”).

9 WHEREAS, the Parties’ Joint Letter involves disputes that relate to a large number of Request
10 for Production of Documents (*i.e.*, 40 requests) and for purposes of economy and judicial efficiency, the
11 Parties have structured their Joint Letter so that they separately address an overarching issue with
12 respect to multiple requests as opposed to filing multiple joint letters based on the same issue.

13 WHEREAS, given the number of requests in dispute, the Parties need to exceed the page limit
14 set by the Court’s Standing Order in their RPD Joint Letter. The Parties believe it is essential for them
15 to exceed the page limit to fully brief the Court on their respective positions.

16 WHEREAS, because the Parties are required to attach the propounded discovery applicable
17 original and amended responses as exhibits to their Joint Letters, they are unable to fully comply with
18 the page limitation for the attachments.

19 NOW, THEREFORE, undersigned counsel for the parties, having met and conferred and good
20 cause appearing, hereby stipulate and agree to extend the page limit for their Joint Letter briefs and the
21 attachments thereto as follows:

- 22
- 23 1) The page limitation for the Parties’ Joint Letter shall be extended to 16 pages.
- 24 2) The page limit for the attachments to the Parties’ Joint Letter shall be extended to 62 pages
25 (*i.e.*, relevant portions of Defendant’s Original Responses to Plaintiff’s Requests for
26 Production of Documents (42 pages) and Defendant’s Supplemental Responses (20 pages)).
- 27
- 28

1
2
3 **IT IS HEREBY STIPULATED.**
4
5

6 Dated: August 11, 2021
7
8

AK EMPLOYMENT LAW OFFICE

9
10 _____
11 */s/ Ayse Kent*
12 Ayse Kent
13 Attorney for Plaintiff MARK FEW
14
15

16 Dated: August 11, 2021
17
18

SEYFARTH SHAW LLP

19 _____
20 */s/ Justin T. Curley*
21 Justin T. Curley
22 Parnian Vafaeenia
23 Attorneys for Defendants
24 LENOVO (UNITED STATES), INC
25
26

27 **ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)**

28 I, Ayse Kent, attest that concurrence in the filing of this Joint Letter Regarding Plaintiff's
29 Requests for Production of Documents has been obtained from the signatory, Justin T. Curley, counsel
30 for Defendant.

31 Executed this 11th day of August 2021 in Tiburon, CA.
32
33

34 _____
35 */s/ Ayse Kent*
36 Ayse Kent
37
38

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: August 24, 2021

Hon. Kandis A. Westmore
United States District Judge